

1 Erin Lee Truman
2 Nevada Bar No. 4668
3 HUTCHISON & STEFFEN, LLC
4 Peccole Professional Park
5 10080 West Alta Drive, Suite 200
6 Las Vegas, Nevada 89145
7 (702) 385-2500 phone
8 (702) 385-2086 facsimile
9 er Truman@hutchlegal.com

6 *Attorneys for Defendants*
7 *M Life, Inc., M'Life Wellness, LLC,*
M'Life Nevada, LLC, Daniel Lutz,
and Daryn Gomez

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

10 MGM RESORTS INTERNATIONAL, a
11 Delaware corporation,

12 Plaintiff,

12

14 M LIFE, INC., a Nevada corporation; M'LIFE
15 WELLNESS, LLC, a Nevada limited liability
16 company; M'LIFE NEVADA, LLC, a Nevada
limited liability company; DANIEL LUTZ, an
individual, and DARVIN GOMEZ, an
individual.

17 Defendants.

Case No.: 2:14-cv-01510-JAD-CWH

**STIPULATION AND ORDER TO
EXTEND THE TIME FOR ALL
DEFENDANTS TO FILE AND SERVE
THEIR JOINT OPPOSITION TO
PLAINTIFF'S MOTION FOR
PRELIMINARY INJUNCTION**

(Sixth Request)

Defendants M Life, Inc., M'Life Wellness, LLC, M'Life Nevada, LLC, Daniel Lutz, and Darvin Gomez (together, the “Defendants”), on the one hand, and Plaintiff MGM Resorts International (“Plaintiff” or “MGM”), on the other hand, state the following:

1. The Complaint was filed on September 17, 2014. (Doc. No. 1.)
2. Each of the Defendants was served with the Summons and Complaint or had accepted service of the Summons and Complaint by October 10, 2014. (Doc. No. 5-7 & 9.)
3. Plaintiff filed a motion for preliminary injunction on October 15, 2014. (Doc. No. 12.) The Defendants' opposition to the motion was due to be filed and served on November 3, 2014. *See* L.R. 7-2; Fed. R. Civ. P. 6(d).

1 successive stipulations to extend that date: (a) from November 3, 2014 to November 17, 2014
2 (Doc. 17); (b) then from November 17, 2014 to December 8, 2014 (Doc. 20); (c) then from
3 December 8, 2014 to December 29, 2014 (Doc. 25); (d) then from December 29, 2014 to
4 January 19, 2015 (Doc. 29); and (e) then from January 19, 2015 to February 9, 2015 (Doc. 32).
5 The Court granted these requests. (Docs. Nos. 18, 23, 26, 30 and 34.)

6 5. Settlement discussions have been productive and the parties' counsel believe
7 that they are close to finalizing a settlement of this case. A proposed settlement agreement has
8 been drafted. Defendants' counsel has proposed edits and Plaintiff's counsel has made a
9 counterproposal that is currently under review. However, due to the general press of business,
10 planned vacation and travel, and the parties' and their counsel's schedules, the parties require
11 and respectfully request additional time to finalize the written settlement agreement.

12 6. Therefore, good cause exists to extend the date for all Defendants to file and
13 serve their joint opposition to Plaintiff's motion for preliminary injunction from February 9,
14 2015 to March 9, 2015.

15 **IT IS SO AGREED AND STIPULATED:**

16 HUTCHISON & STEFFEN, LLC

LEWIS ROCA ROTHGERBER LLP

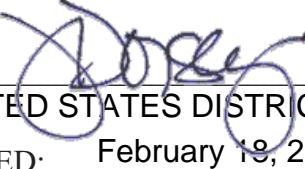
17 BY /s/ Erin Lee Truman
18 Erin Lee Truman
Peccole Professional Park
19 10080 West Alta Drive, Suite 200
Las Vegas, NV 89145

BY /s/ Jonathan W. Fountain
Michael J. McCue
Jonathan W. Fountain
Meng Zhong
3993 Howard Hughes Parkway, Suite 600
Las Vegas, NV 89169-5996

20 *Attorneys for Defendants*
21 *M Life, Inc., M'Life Wellness, LLC,*
M'Life Nevada, LLC, Daniel Lutz,
and Darvin Gomez

22 *Attorneys for Plaintiff*
MGM Resorts International

23 **IT IS SO ORDERED:**

24 
25
26 UNITED STATES DISTRICT JUDGE
27 DATED: February 19, 2015